



U.S. Department of Justice

United States Attorney
Southern District of New York

86 Chambers Street
New York, New York 10007

July 15, 2022

By ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

MEMO ENDORSED

Re: *Melody Business Finance, LLC v. Falcone, et al.*, No. 22-CV-1698 (KPF)

Dear Judge Failla:

This Office represents the United States of America (the “Government”) in the above-referenced action. We write respectfully to request an extension of the deadline for the parties to submit a proposed protective order (and any other discovery agreements) to the Court.

Per its Order dated July 12, 2022, the Court granted an extension of deadline from the date specified in the Civil Case Management Plan and Scheduling Order, Dkt. 20, to today. Dkt. 23. While the parties have made progress discussing potential discovery orders since then, we need additional time to continue those discussions. As such, the Government respectfully requests an additional extension of this deadline from today to August 1, 2022. Plaintiff consents to this request. As stated during the initial pretrial conference held on June 9, 2022, the remaining defendants do not intend to actively participate in discovery, but have agreed to abide by all orders of the Court regarding discovery.

We thank the Court for its consideration of this request.

Respectfully submitted,

DAMIAN WILLIAMS
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cc: all counsel of record (by ECF)

Application GRANTED. The Clerk of Court is directed to terminate the pending motion at docket number 25. SO ORDERED.

Dated: July 18, 2022
New York, New York

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE